

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
ROBERTA LUDWIG

Plaintiff,

-against-

MARIANNE TASKER

Defendant.
-----X

VERIFIED ANSWER

Case #2:19-CV-03870

Jury Trial Demanded

Defendant, MARIANNE TASKER, by her attorneys, BRUNO, GERBINO & SORIANO, LLP, states upon information and belief as and for her answer to the plaintiff's complaint:

FIRST: Defendant denies each and every allegation contained in paragraphs numbered "9", "11", "12", "13", "14", "15", "16", "17", "18", "20", "21", and "22" of the plaintiff's complaint.

SECOND: Defendant denies having knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs numbered "1", "3", "7", "8", and "10" of the plaintiff's complaint.

THIRD: Defendant denies having knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs numbered "4" and "19" of the plaintiff's complaint, and refers all questions of law and fact to this Honorable Court and the triers of fact at the trial of this action.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

FOURTH: If the plaintiff has been injured and damaged as alleged in plaintiff's complaint, upon information and belief, such injuries and damages were caused, in whole or in part, or were contributed to by reason of the carelessness, negligence or want of care on the part of the plaintiff and not by any carelessness, negligence or want of care, on the part of the defendant, and if any carelessness, negligence or want of care other than that of the plaintiff were caused or contributed to said alleged injuries and damages, it was the carelessness, negligence or want of care on the part of

some other party or persons, firm or corporation, his, its or their agents, servants or employees over whom defendant has no control and for whose, carelessness, negligence or want of care defendant is not and was not responsible or liable.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

FIFTH: That whatever injuries and/or damages were sustained by the plaintiff at the time and place alleged in the complaint were in whole or in part the result of the plaintiff's own culpable conduct.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

SIXTH: Upon information and belief, any part or future costs and/or expenses incurred or to be incurred by the plaintiff for medical care, dental care, custodial care or rehabilitation services, loss of earnings or other economic loss, has been or will with reasonable certainty be replaced or indemnified in whole or in part from a collateral source as defined in Section 4545(c) of the New York Civil Practice Law and Rules.

EIGHTH: If any damages are recoverable against the said answering defendant, the amount of such damages shall be diminished by the amount of the funds which plaintiff has or shall receive from such collateral source.

WHEREFORE, defendant demands judgment dismissing the plaintiff's complaint herein, together with the costs and disbursements of this action.

Dated: Melville, New York
August 21, 2019

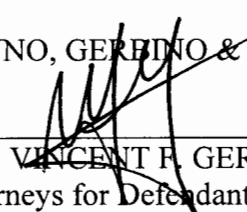
TO:

BALSAM LAW FIRM, PLLC.
Attorneys for Plaintiff
315 Madison Avenue, Ste. 1306
New York, NY 10017
(212) 286-8899

Yours, etc.,

BRUNO, GERBINO & SORIANO, LLP.

By:



VINCENT F. GERBINO VG0555
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Melville, NY 11747-3601
(631) 390-0010
Our File #HO180-3020

Index No.: 2:19-CV-03870

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
ROBERTA LUDWIG

Plaintiff(s),

-against-

MARIANNE TASKER

Defendant(s)

VERIFIED ANSWER & DISCOVERY DEMANDS

BRUNO, GERBINO & SORIANO, LLP

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(631) 390-0010
70 Hilltop Road
Ramsey, New Jersey 07446
(201) 995-1394

BGS@BGSLAW-NY.COM

File No.: HO180-3020

Pursuant to 22 NYCRR 130-1.1-a, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, to the best of my knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the presentation of this document, or the contentions contained therein, are not frivolous.

Dated: August 21, 2019

Signature 
Print Signer's Name Vincent F. Gerbino

Service of a copy of the within

is hereby admitted.

Dated,

Attorney(s) for

Sir: Please take notice

☐ NOTICE OF ENTRY

that the within is a (certified) true copy of a
duly entered in the office of the Clerk of the within named Court on

☐ NOTICE OF SETTLEMENT

that an order
settlement to the HON.

on the _____ day of _____

at _____

of which the within is a true copy will be presented for
one of the Judges of the within named Court, at _____ m.